

WWR#041469910

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK (ALBANY)

In Re:

KRIS DANIEL ROGLIERI,

Debtor.

Case No. 24-10157-1-REL
Chapter 7

RESPONSE OF KEYBANK, N.A. TO TRUSTEE'S
MOTION TO SELL PROPERTY

Now comes Creditor, KEYBANK, N.A. ("Respondent") and hereby responds to Trustee's Motion to Sell Property (Doc No 403) filed on April 2, 2025, and responds as follows:

1. On April 8, 2013, Kris Daniel Roglieri (hereinafter "Debtor") executed and delivered to KeyBank, N.A. a Fixed/Adjustable Rate Note. In addition on November 6, 2018, Debtor executed and delivered to KeyBank, N.A. a Key Equity Options Agreement. Both loans were to finance the following property: 40 North Road, Queensbury, NY 12804.

2. On February 15, 2024, Debtor filed a Chapter 11 petition with this Court. On May 15, 2024 the Bankruptcy case was converted to a Chapter 7.

3. Trustee filed a Motion to Sell Property Free and Clear of Liens on April 2, 2025.

4. Respondent consents to the sale motion and recommends court approval from KeyBank's perspective.

WHEREFORE, KEYBANK, N.A. respectfully requests that the Debtor's Motion to Sell
Property be approved.

Respectfully submitted,

/s/ Garry Masterson
GARRY MASTERSON
Weltman, Weinberg & Reis Co., L.P.A.
5990 West Creek Road, Suite 200
Independence, OH 44131
216-672-6984
216-739-5680 (fax)
gmasterson@weltman.com
Counsel for Creditor
KEYBANK, N.A.

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CERTIFICATE OF SERVICE

I hereby certify that on, May 5, 2025, I electronically filed the Response to Trustee's Motion to Sell Property with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following:

CHAPTER 7 TRUSTEE
Christian H. Dribusch
187 Wolf Road, Suite 300-20
Albany, NY 12205

And, I hereby certify that I have mailed by the United States Postal Service the document to the following non CM/ECF participants:

Lisa M Penpraze, Attorney for U.S. Trustee
11A Clinton Avenue, Room 620
Albany, NY 12207

CHAPTER 7 TRUSTEE
Christian H. Dribusch
187 Wolf Road, Suite 300-20
Albany, NY 12205

KRIS DANIEL ROGLIERI (DEBTOR)
11 HILL TOP LANE
POUGHKEEPSIE, NY 12207

OFFICE OF THE U.S. TRUSTEE
11A Clinton Avenue, Room 620
Albany, NY 12207

/s/ Garry Masterson

GARRY MASTERSON
Weltman, Weinberg & Reis Co., L.P.A.
5990 West Creek Road, Suite 200
Independence, OH 44131
216-672-6984
216-739-5680 (fax)
gmasterson@weltman.com
Counsel for Creditor, KeyBank, N.A.